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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

THE IOWA FARM SACTUARY, an Iowa non-)
profit corporation, and SHAWN CAMP,)

Plaintiffs,)

v.)

UNIVERSITY OF MISSOURI VETERINARY)
HEALTH CENTER, by and through)
CURATORS OF THE UNIVERSITY OF)
MISSOURI, COLUMBIA, DR. JOAN COATES,)
D.V.M., in her official and individual capacity,)
and DR. JANE DOE, D.V.M., in her individual)
and official capacity,)

Defendants.)

Case No. 2:24-cv-04141-MDH

**STIPULATION TO MODIFY DEADLINES
AND SCHEDULING ORDER**

The Parties have reviewed the Court's Order Setting Deadline for Filing of Proposed Scheduling Order and for Rule 26(f) Conference, filed September 19, 2024, and for good cause, propose the following stipulated modifications.

On September 18, 2024, Defendants University of Missouri Veterinary Health Center, by and through the Curators of the University of Missouri, Columbia and Dr. Joan Coats filed their Motion to Dismiss Plaintiffs' Complaint and Suggestions in support thereof. Dkts. 10, 11. Plaintiffs' response and opposition to the Motion to Dismiss is due October 2, 2024.

On September 19, 2024, the Court issued its Order setting deadlines for the filing of their proposed scheduling order and for the parties' Rules 26(f) conference. Dkt. 12. The Court ordered the parties to complete their initial disclosures and conduct their Rule 26(f) conference on or before October 21, 2024, and then to file their joint proposed scheduling order and discovery plan by November 6, 2024. *Id.*

Plaintiffs, with the stipulated consent of Defendants, now respectfully request that the Court extend their deadline to respond to the Motion to Dismiss by thirty days to November 1, 2024. The parties request that the Court set Defendants' deadline to reply to Plaintiffs' opposition to December 1, 2024. This is the first request for an extension of time filed in this matter.

Plaintiffs, with the stipulated consent of Defendants, further respectfully request that the Court extend their deadline to complete their initial disclosures and conduct their Rule 26(f) conference by thirty days to November 21, 2024. The parties would then file their joint proposed scheduling order and discovery plan by December 6, 2024.

Plaintiffs submit that good cause exists for this request because Plaintiffs require additional time respond to the Motion to Dismiss and conduct their Rule 26(f) obligations because Plaintiffs' counsel is set for jury trial in the U.S. District Court for the Northern District of California, to commence on October 15, 2024. Plaintiffs' counsel is set for a bench trial in the U.S. District Court for the Middle District of Florida the week of November 2, 2024. Plaintiff's trial preparation obligations are extensive, so Plaintiffs require additional time to meet and confer with Defendants to meet their Rule 26(f) obligations, complete their initial disclosures, and respond to Defendant's Motion to Dismiss. Upon reviewing Defendants' Motion and the Court's Scheduling Order, Plaintiffs immediately conferred with Defendants regarding their trial

schedule and the need for these extension requests on September 18, 2024, and Defendants agreed to the requested extensions of the deadlines.

THEREFORE, the Parties stipulate to the following schedule for responding to Defendants' Motion to Dismiss and completing their Rule 26(f) obligations:

- 1) Plaintiffs will respond in opposition to Defendants' Motion to Dismiss on or before November 1, 2024;
- 2) Defendants will reply to Plaintiffs' response in opposition to Defendants' Motion to Dismiss on or before December 1, 2024;
- 3) The Parties will conduct their Rule 26(f) Conference on or before November 21, 2024;
- 4) The Parties will complete their initial disclosures and file their joint proposed scheduling order and discovery plan on or before December 6, 2024.

Respectfully submitted this 23rd day of September, 2024.

/s/ Jessica Blome

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